

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: DEC 15 2000

SUBJECT: Biological Technical Assistance Group Review
Dayco Corp./L.E. Carpenter Company site

MC for
FROM: Mindy J. Pensak, Coordinator
Biological Technical Assistance Group (DESA-HWSB)

TO: Stephen Cipot, Remedial Project Manager
New Jersey Remediation Branch (ERRD-NJRB)

The following comments represent the consensus of the Region II Biological Technical Assistance Group (BTAG) review. The document reviewed by the group was the "Work Plan for Delineating and Characterizing Elevated Lead Concentrations in Soil," prepared by RMT, Inc., dated September 6, 2000, for the Dayco Corp./L.E. Carpenter Company site located in Wharton Borough, Morris County, New Jersey.

The April 1994 Record of Decision (ROD) specified excavation of soils which contain elevated levels of lead. However, during the excavations it was discovered that the extent of contamination was greater than anticipated. Therefore, a change in the remedial action may be proposed.

It is noted in the document that a human health risk assessment will be conducted to evaluate potential risks associated with direct contact and inhalation of lead (page 6). However, an ecological risk assessment should also be included in this evaluation. Based upon previous data, it appears that elevated lead concentrations have been detected in the drainage ditch adjacent to the site and the Rockaway River. Therefore, these areas should also be incorporated into the risk assessment. Additionally, a determination should be made if any of the adjacent wetlands have been impacted.

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In order to comply with federal wetlands ARARs, a wetlands assessment and restoration plan would be needed for any wetlands impacted or disturbed by contamination and/or remedial activities. Management practices (Federal Register Volume 51, No. 219, Part 330.6) should be implemented.

If you have any questions, comments, or require further information, please contact Michael Clemetson at (908) 321-6712.

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